

75082-3

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

MAY 22 2013

Biologic, Inc.  
c/o Krud Kutter, Inc.  
115 Obtuse Hill Road  
Brookfield, CT 06804

Attention: Jane M. Miller, Agent

Subject: Krud Kutter MC-2  
EPA Registration No. 75082-3  
Notification Dated April 15, 2013

This will acknowledge receipt of your notification, submitted under the provisions of FIFRA Section 3(c)(9).

**Proposed Notification**

- Updated "Storage and Disposal" instructions per PR Notice 2007-4
- Revise the Emergency telephone numbers in the "First Aid" section

**General Comments**

Based on a review of the submitted material, the following comments apply:

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6341.

Sincerely,

Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)



United States  
Environmental Protection Agency  
Washington, DC 20460

 Registration  
 Amendment  
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 75082-3	2. EPA Product Manager M. Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Krud Kutter MC-2	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Krud Kutter, Inc. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4 and revision to emergency contact information per PR Notice 98-10. This notification is consistent with the guidance in PR Notice 2007-4 and PR Notice 98-10 and the requirements of EPA's regulations at 40 CFR 40 152.46, 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements 40 CFR 152.46, 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input checked="" type="checkbox"/> Other (Specify) _____ metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 10 & 50 grams, 64 oz, 30 & 55 gal		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph	<input type="checkbox"/> Paper glued	<input type="checkbox"/> Stenciled	<input type="checkbox"/> Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Jane M. Miller	Title Agent	Telephone No. (Include Area Code) (203) 740-1200
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <b>(Stamped)</b>
2. Signature 	3. Title Agent	
4. Typed Name Jane M. Miller	5. Date April 18, 2013	

**BIOLOGIC CONSULTING, INC.**  
*agribusiness professionals*

April 15, 2013

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
US Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Room S-4900, 4<sup>th</sup> Floor  
Arlington, VA 22202

Attention: Mr. Marshall Swindell (PM #33)

Re: "Krud Kutter MC-2", EPA Reg. No. 75082-3  
Application for Pesticide Notification to  
Revise Storage & Disposal Instructions as per PR Notice 2007-4; &  
Revise Emergency Contact Phone Numbers per PR Notice 98-10

Dear Mr. Swindell:

On behalf of Krud Kutter, Inc. we are submitting the above mentioned Application for Pesticide Notification for the above mentioned product. The purpose of this notification is to:

- 1. Update the storage and disposal instructions as per PR-Notice 2007-4 as stated below:

"This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

- 2. Revise the emergency contact phone numbers in the First Aid section as per PR Notice 98-10 as stated below:

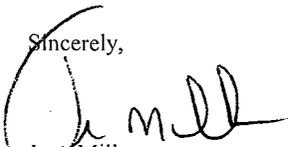
"This notification is consistent with the provisions of PR Notice 98-10 and the EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

The following documents are enclosed to process this Notification:

- 1. Application for Pesticide Notification (8570-1)
- 2. One (1) copy of the revised label with the deleted language lined-out and the additional language underlined.
- 3. Three (3) copies of clean labeling.

Should you have any questions, or wish to reach me, please feel free to contact our office at 203-740-1200.

Sincerely,

  
Jane Miller  
Agent to Krud Kutter, Inc.



579

Orig. EPA Approved 10142005

Last approved - notification 01 10 2013

Notification to update storage and disposal statement 03 29 2013

MARKED LABEL

**KRUD KUTTER MC-2**

[PAINT] MILDEWCIDE

[alt. brand name: Krud Kutter MC-2 Paint Mildewcide]

**[Optional Marketing Statements]**

*(Inhibits Mildew on Interior and Exterior Paint Films)*

*(Inhibits Mold on Interior and Exterior Paint Films)*

*(Inhibits Mold and Mildew on Interior & Exterior Paint Films)*

*(Blends Easily Into All Standard Latex Type and Oil Base Paint Formulations)*

*(For Use In Interior or Exterior Paint)*

*(Inhibits the Growth of Mold and Mildew on Adhesive Films, Paint Films, Paper Products, and Natural and Synthetic Fibers)*

*(Inhibits Mold & Mildew on Adhesives)*

**Treats 210 Gallons of Paint or Stain**

**PRECAUTIONARY STATEMENTS**

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with eyes, skin and clothing. Wash thoroughly with soap and water after handling.

**FIRST AID**

If in Eyes:	Hold eyelid open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
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Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this product, contact the National Pesticide Information Center, 1-800-858-7378, Monday-Friday, 7:30 AM-3:30 PM PST. You may also contact the National Poison Control Center, 1-800-222-1222, day or night, for emergency medical treatment information.

***(Label Directions for Paint, Adhesive, Paper, & Natural and Synthetic Fiber Uses)***

**ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product in to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

***(containers smaller than 5 gallons)***

Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of waste.

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MARKED LABEL

**DIRECTION FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Surfaces to be painted or stained must be clean, dry, sound, and free of existing mildew.

The dispenser is calibrated so that when fully pressed down, it will release sufficient mildewcide to treat one (1) gallon of paint. To treat a five (5) gallon pail of paint, the dispenser will need to be fully pressed down and released five (5) times, and so on. Shake or stir thoroughly, then use paint as directed.

Note that this dispenser provides effective protection for normal painted surfaces. For extremely damp areas prone to mildew, two (2) pumps for 1 gallon or ten (10) pumps for 5 gallons should be used.

***(Directions for 10 gram packet)***

Add contents (10 grams) to one (1) gallon of paint or stain. Shake or stir thoroughly, then use paint as directed.

Note that the content of this packet provides effective protection for normal painted surfaces. For extremely damp areas prone to mildew, two packets should be used and for New York housing authority specifications 3-4 pouches, depending on the protection needed.

***(Directions for 50 gram packet)***

Add contents (50 grams) to five (5) gallons of paint or stain. Shake or stir thoroughly, then use paint as directed.

Note that the content of this packet provides effective protection for normal painted surfaces. For extremely damp areas prone to mildew, two packets should be used and for New York housing authority specifications 3-4 pouches, depending on the protection needed.

***(Label Directions for Paint, Adhesive, Paper, & Natural and Synthetic Fiber Uses)***

**PAPER PRODUCTS**

KRUD KUTTER MC-2 is most efficiently applied via the tub or water trough. The tub-size or water-trough solutions should be adjusted to a pH below 4.0. The KRUD KUTTER MC-2 should then be added with thorough agitation. Effective dosage levels will range from 0.04 to 0.2% KRUD KUTTER MC-2 based on the finished paper weight.

Note: KRUD KUTTER MC-2 should be only used for non-food grade paper products.

**CANVAS TEXTILES**

The simplest treatment method is to prepare a trough with water at pH 3-4 and then add the KRUD KUTTER MC-2 to obtain the desired concentration. The fabric is passed through the solution until the proper amount of solution is absorbed on the fabric. A wetting agent may be used to aid the solution in penetrating the fabric. The KRUD KUTTER MC-2 should be applied

Orig. EPA Approved 10142005

Last approved - notification 01 10 2013

Notification to update storage and disposal statement 03 29 2013

MARKED LABEL

at dosage levels from 0.1 to 0.6% based on finished fabric weight. The amount necessary to provide the desired protection against mold and mildew can then be determined. If deposition of KRUD KUTTER MC-2 onto the canvas is desired, a subsequent wash with 1% soda ash solution will suffice. This can be followed by normal processing steps of the canvas textile. KRUD KUTTER MC-2 should be used for manufacture of canvas textiles only, such as tents and awnings.

NYLON CARPETING

Using conventional methods such as spin finish application or melt blending, apply 0.05% (spin finish) to 0.5% (melt blending) of KRUD KUTTER MC-2 based on total weight of the material being used.

For Use in [Interior or Exterior Paints][Adhesives][Paper Products][and][Natural and Synthetic Fiber]

KRUD KUTTER MC-2 can be added at any stage in the formulation provided there is sufficient agitation to properly disperse it throughout the finished product. Levels will range from 0.01% to 0.8% by weight of KRUD KUTTER MC-2 depending on the application (e.g. 0.1 to 8 lbs. per 1,000 lbs. = 0.01% to 0.8% by weight). This can be determined by laboratory evaluation using the following guidelines:

Paint		
Interior Latex Based Paint	0.02 – 0.15%	
Exterior Latex Based Paint	0.05 – 0.30%	
Exterior Zinc Oxide Latex Paint	0.03 – 0.20%	
Adhesive		
Latex Based Adhesive	0.05 – 0.30%	cccc
Starch Based Adhesive	0.10 – 0.60%	cccc
Dextrine Based Adhesive	0.10 – 0.60%	cccc
Casein Based Adhesive	0.30 – 0.80%	cccc
Paper Products		
Based on Finished Paper Weight	0.01 – 0.20%	cccc
Natural and Synthetic Fiber		
Canvas Textiles	0.10 – 0.60%	cccc
Nylon and Other Synthetics	0.10 – 0.80%	cccc

Note: Do not use for any paint applications involving direct or indirect food or drinking water contact.

8/9

[Instructions for Pouches and Dispenser -

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store product in a cool, dry place out of the reach of children.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor (including toilet) or outdoor (including sewer) drain.

[Instructions for Paint, Adhesive, Paper, & Natural and Synthetic Fiber Uses -

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store product in a cool, dry place out of the reach of children.

**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the hazardous waste representative at the nearest EPA Regional Office for guidance.

**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Triple rinse as follows.

**Plastic or Metal Containers greater than 5 Gallons:** Empty the remaining contents into formulation equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into formulation equipment or a mix tank or store rinsate for later use or disposal.

**Pressure rinse as follows:** Empty the remaining contents into formulation equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

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cccc  
cccc

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Storage:** Store product in a cool, dry place out of the reach of children.

**Pesticide Disposal:** ~~(Instructions for pouches & dispenser pump)~~ Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

~~(Instructions for Paint, Adhesive, Paper, & Natural and Synthetic Fiber Uses)~~ Pesticide wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the hazardous waste representative at the nearest EPA

9/9

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MARKED LABEL

Regional Office for guidance:

Container Disposal: ~~(Instructions for pouches and dispenser pump)~~ Do not reuse this container. Place in trash or offer for recycling if available.

~~(Instructions for Paint, Adhesive, Paper, & Natural and Synthetic Fiber Uses)~~

~~Metal Containers: Triple-rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.~~

~~Plastic Containers: Dispose of as for metal containers. May also be incinerated, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.~~

**Notice:** Seller expressly warrants that the product conforms to its chemical description. There are not warranties associated with the sale of this product either expressed or implied, including but not limited to the warranties of fitness for a particular purpose of merchantability.

24 Hour Medical Emergency:  
Chemtel (800) 255-3924

Krud Kutter, Inc.  
1535 Oak Industrial Lane, Suite B  
Cumming, GA 30041  
(800) 466-7126  
Email: [sales@krudkutter.com](mailto:sales@krudkutter.com)  
[www.krudkutter.com](http://www.krudkutter.com)

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